EXHIBIT 2

UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS CENTRAL DIVISION

LOUIS P. ALBERGHINI,	CIVIL ACTION NO. 04-40092-FDS
Plaintiff,)
v.	Jonathan R. Sigel, BBO# 559850 Kathryn E. Abare-O'Connell, BBO# 647594
SIMONDS INDUSTRIES INC.,) Kathryn E. Abare-O Connell, BBO# 64/594
Defendant.	

SECOND AFFIDAVIT OF ILDA M. THIBODEAU

I, Ilda M. Thibodeau, do hereby depose and state as follows:

- My name is Ilda M. Thibodeau. All statements contained in this affidavit are made of my
 own personal knowledge or have been verified by reviewing the relevant business and
 personnel records of Defendant Simonds Industries Inc. ("Simonds" or "the Company"). As
 to those facts stated on information and belief, I believe them to be true.
- I am the Director of Human Resources for Simonds, and I have held that position since September 2001. I have been employed with Simonds or its predecessors since May 1983, and I have worked in the Human Resources Department during that entire time.
- As part of my duties and responsibilities as Human Resources Manager at Simonds, I am
 the custodian of the personnel records of all current and former employees of the
 Company, including Plaintiff Louis Alberghini.
- 4. Three of the five employees at Simonds' Fitchburg facility who were laid off as a result of the Company's January 2000 RIF were soon rehired by Simonds. Those individuals are James Bourque (whose date of birth is 9/23/51), Victoria Lanides (whose date of birth is

7/21/43) and Louis Alberghini (whose date of birth is 8/30/40). Mr. Bourque's and Ms. Lanides' employment at Simonds continued for several years after they were rehired.

- Simonds' President, Raymond Martino, and Simonds' Vice-President of Manufacturing, Ronald Owens, approved the decision to rehire Mr. Alberghini, who was 59 years old at the time. (A true and accurate copy of the "Change Request" documenting such approval is attached hereto as <u>Exhibit 1</u>.)
- 6. Mr. Martino and Mr. Owens were not employed by the Company during Patricia Jearman's employment at Simonds.

Signed under the pains and penalties of perjury this 27th day of October 2005.

Ilda M. Thibodeau, Director of Human Resources Simonds Industries Inc.